

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

INDIAN HARBOR INSURANCE COMPANY,

Plaintiff,

v.

THE CITY OF SAN DIEGO,

Defendant.

Case No. 12cv-5787 (JGK-KNF)

**MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern District of New York, I, Kathleen F. Donovan, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:


Michael J. Stoner, Esq.
Anderson Kill & Olick, P.C.
864 E. Santa Clara Street
Ventura, CA 93001
Tel: (805) 288-1300
Fax: (805) 288-1301

Michael J. Stoner, Esq. is a member in good standing of the Bar of the State of California. There are no pending disciplinary proceedings regarding Michael J. Stoner, Esq. in any State or Federal Court.

Dated: November 12, 2012

Respectfully submitted,

By:



Kathleen F. Donovan
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 278-1000

Attorneys for Defendants
The City of San Diego

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

INDIAN HARBOR INSURANCE COMPANY,

Plaintiff,

v.

THE CITY OF SAN DIEGO,

Defendant.

Case No. 12cv-5787 (JGK-KNF)

**AFFIRMATION OF
KATHLEEN F. DONOVAN,
ESQ. IN SUPPORT OF
MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

STATE OF NEW YORK)
) SS:
COUNTY OF NEW YORK)

Kathleen F. Donovan, Esq., being duly sworn, hereby deposes and says as follows:

1. I am an attorney with the law firm of Anderson Kill & Olick, P.C. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Michael J. Stoner, Esq. as counsel *pro hac vice* to represent Defendant The City of San Diego in this matter.

2. I am a member in good standing of the bar of the State of New York and the United States District Court for the Southern District of New York, and was admitted to practice law in the State of New York in April 2012.

3. Mr. Stoner is an attorney licensed to practice law in the State of California and has been a member in good standing of the California Bar since 2010. *See* Exhibit A. He is an active member in good standing and currently eligible to practice law in the U.S. District Court for the Central District of California and the State of California.

4. There are no disciplinary proceedings pending against Mr. Stoner, nor has he ever been subject to any disciplinary proceedings.

5. Mr. Stoner has never been subject to any suspension or disbarment proceedings.

6. Mr. Stoner is familiar with and shall be governed by the local rules of this court, the rules of professional conduct and all other requirements governing the professional behavior of members of the New York Bar.


7. I respectfully submit a proposed order granting the admission of Michael J. Stoner, *pro hac vice*, which is attached as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit Michael J. Stoner, Esq., *pro hac vice*, to represent Defendant The City of San Diego, in the above captioned matter, be granted.

Dated: November 12, 2012

Respectfully submitted,

By:


Kathleen F. Donovan
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 278-1000

Attorneys for Defendant
The City of San Diego

EXHIBIT A



THE STATE BAR OF CALIFORNIA

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

October 16, 2012

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MICHAEL JOHN STONER, #269152 was admitted to the practice of law in this state by the Supreme Court of California on March 4, 2010; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in cursive script, appearing to read "Louise Turner".

Louise Turner
Custodian of Membership Records

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INDIAN HARBOR INSURANCE COMPANY,

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v.

THE CITY OF SAN DIEGO,

Defendant.

Case No. 12cv-5787 (JGK-KNF)

**ORDER FOR ADMISSION
PRO HAC VICE ON
WRITTEN MOTION**

Upon the motion of Kathleen F. Donovan, Esq., attorneys for Defendant The City of San Diego, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Michael J. Stoner, Esq.
Anderson Kill & Olick, P.C.
864 E. Santa Clara Street
Ventura, CA 93001
Tel: (805) 288-1300
Fax: (805) 288-1301

is admitted to practice *pro hac vice* as counsel for Attorneys for Defendant The City of San Diego, in the above captioned case in the United States District Court of the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: November __, 2012

United States District Judge John G. Koeltl